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May 11, 2017

Via ECF

Magistrate Judge Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East, 505 North
Brooklyn, New York 11201

Re: ***Allstate Ins. Co., et al. v. Abramov, et al.* 16-CV-1465 (AMD) (VMS)**
Joint Letter Advising Court of Status of Discovery

Dear Judge Scanlon:

Along with Cadwalader, Wickersham & Taft LLP, we represent Plaintiffs-Counterclaim Defendants Allstate Insurance Company, Allstate Indemnity Company, Allstate Property & Casualty Insurance Company, Allstate New Jersey Insurance Company, and Allstate Fire & Casualty Insurance Company (collectively, "Plaintiffs") in the above-referenced matter. Jointly with defense counsel, the parties respectfully submit this letter to advise the Court of the status of discovery pursuant to the Court's Order dated March 23, 2017 (ECF No. 242).

Presently, there are no discovery issues to report. The parties have exchanged discovery demands, as well as some responses thereto, and the parties expect that further responses will be made prior to the Status Conference scheduled for May 26, 2017, *see* Apr. 14, 2017 Re-Scheduling Order. Furthermore, Plaintiffs anticipate making document productions in the near future and have circulated a confidentiality agreement that will be submitted to the Court for review and, if acceptable, approval, which will allow the parties to freely exchange discovery that contains confidential information. In the interim, Plaintiffs have continued to seek and receive non-party discovery that will be made available to Defendants for inspection along with Plaintiffs' document production.

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Thank you for your consideration in this regard.

Respectfully submitted,

MORRISON MAHONEY LLP

By: /s/ Andrew Midgett
Andrew S. Midgett, Esq.

Cc:

All Counsel (via ECF)